

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

JAMES C. FOCHT and KAREN FOCHT

Plaintiffs

v.

SETERUS, INC.

Defendant

CIVIL ACTION NO. 3:18-cv-151

**DEFENDANT SETERUS, INC.'S  
CORPORATE DISCLOSURE STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Seterus, Inc., by counsel of record, hereby states as follows:

Defendant Seterus, Inc., is a wholly owned subsidiary of Pixel Acquisition Corp., that, is in turn, wholly owned by International Business Machines Corporation.

Respectfully submitted,

**HLADIK, ONORATO & FEDERMAN, LLP**

By: /s/ Eric J. Phillips

Stephen M. Hladik, Esquire  
Eric J. Phillips, Esquire  
Lauren L. Schuler, Esquire  
*Attorneys for Defendant  
Seterus, Inc.*

Date: September 17, 2018